

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

COALITION TO MARCH ON THE RNC,

Plaintiff,

v.

Case No. 24-CV-704

**CITY OF MILWAUKEE, CAVALIER JOHNSON,
in his official capacity as Mayor of the City of
Milwaukee, and JERRELL KRUSHKE, in his
official capacity as Commissioner of Public
Works for the City of Milwaukee,**

Defendants.

DECLARATION OF AUDREY GIBSON CICCHINO

I, Audrey Gibson Cicchino, declare:

1. I am the 2024 Republican National Convention Coordinator for the U.S. Secret Service ("Secret Service"). In this capacity, I am responsible for working with Secret Service personnel and other federal, state, and local agencies to design and implement a security plan for the upcoming Republican National Convention ("RNC") in Milwaukee, Wisconsin. I report to the Dignitary Protective Division in Washington, D.C.

2. I have been a Special Agent with the Secret Service for over 15 years. My past assignments have included more than four years with the Protective Intelligence Division, where I worked as an advance agent for numerous large-scale events, to include the G20 Summit, the ASEAN Summit, a G7 Summit, and the 2018 Winter Olympic Games. I also worked on security planning for various major events domestically and have conducted numerous protective

intelligence advances for Secret Service protectees within the United States and abroad.

3. I was selected as the Secret Service Convention Coordinator for the RNC in April 2023 and transferred to Milwaukee in August 2023. Since relocating to Milwaukee, I have worked full time on security planning for the RNC. An Assistant Convention Coordinator also relocated to Milwaukee at around the same time and has been working with me on a full-time basis on RNC security planning.

The RNC

4. The RNC is scheduled to occur at the Fiserv Forum and other venues in downtown Milwaukee from July 15 through July 18, 2024. The other venues to be used by the RNC for convention functions during that time period are the Baird Center, UWM Panther Arena, Miller High Life Theatre, and the Milwaukee Historical Society (collectively, with Fiserv Forum, “Convention Venues”). There is also an opening event scheduled for July 14, 2024, at Henry Maier Festival Park.

5. It is estimated that more than 50,000 delegates, staff, visitors, press, and law enforcement personnel will come to Milwaukee for the RNC. Many political leaders of regional, national, and world stature, including Secret Service protectees, will participate in the convention.

6. The Committee on Arrangements (COA) has contracted with more than 110 hotels to house six to eight thousand delegates throughout the area. Delegates and other convention participants will be participating in events at the various RNC sites each afternoon and evening during the convention week. The delegates may choose to arrive at the Convention Venues by a secure bus provided by the RNC or access the venues on foot, taxi, or rideshare.

Statutory Jurisdiction of the Secret Service

7. Pursuant to 18 U.S.C. § 3056, the Secret Service is charged with protecting the President, Vice-President, President-Elect, and Vice-President-Elect, and the immediate families of these individuals. Section 3056(a) also provides for Secret Service protection for former Presidents and their spouses. In addition, the Secret Service is responsible for protecting major Presidential and Vice-Presidential candidates, and, within 120 days of the general Presidential election or as directed by the President, the spouses of these candidates. 18 U.S.C. § 1752 prohibits persons and groups from entering a restricted area where a Secret Service protectee is or will be visiting.

8. Under 18 U.S.C. § 3056(e)(1), the Secret Service is charged with participating in the planning, coordination, and implementation of security operations at special events of national significance. 18 U.S.C. § 1752 also prohibits persons and groups from entering an area restricted in conjunction with an event designated as a special event of national significance.

Secret Service Role in Planning and Providing Security for the RNC

9. The Secretary of Homeland Security designated the Republican National Convention as a recurring National Special Security Event on September 24, 2018. Pursuant to 18 U.S.C. § 3056(e)(1), the Secret Service has assumed its role as the lead federal agency to work with other federal, state, and local law enforcement and public safety organizations to design, plan, and implement security measures at the event as contemplated by Presidential Policy Directive 22 (2013).

10. As the lead federal agency charged with designing, planning, and implementing

security at the RNC, the Secret Service's responsibilities include protecting the candidates, their spouses, and any other Secret Service protectees in attendance and ensuring the safety of all others attending or participating in the convention.

11. In planning for this or any other major event, the Secret Service considers many potential security threats, including but not limited to terrorist attacks, lone gunmen, fire, environmental hazards, chemical or biological attacks, structural safety concerns, vehicle attacks, and suicide bombers. The security plan includes strategies to prevent attacks, and emergency response strategies in the event they do occur.

12. Security planning for the RNC is a collaborative process between the Secret Service and many other interested state, federal, and local agencies, and draws upon the expertise of law enforcement as well as experts in public health and safety, emergency response, disaster response, traffic flow, and many other fields.

13. As Convention Coordinator for the Secret Service, I work especially closely with the City of Milwaukee and the Milwaukee Police Department ("MPD"). I have met or spoken with MPD or City of Milwaukee personnel on a near-daily basis for months and will continue to work closely with the MPD on planning for all security issues connected with the RNC.

14. As security planners, the Secret Service does not plan the convention itself, nor do we determine the many ways that the City of Milwaukee will host the convention. The COA decides what convention events will occur, and when and where. The Mayor and other City government officials make many decisions concerning traffic flow and use of the streets and parks under the City's jurisdiction. The COA's plans for the convention, and the City's plans for hosting the convention, are the starting point for our security plan. Our role is to devise security

strategies that will permit these plans to be implemented safely.

15. In planning security for the RNC, the Secret Service, MPD, and our law enforcement partners must balance security needs with the First Amendment rights of citizens; public safety, to include access to emergency services; the needs of residents and business proprietors in the vicinity of the Convention Venues to access their homes and businesses; traffic flow and transportation needs for all those who live or work in Milwaukee; and ongoing law enforcement needs unrelated to the convention.

Security Zones at the RNC

16. A critical aspect of security planning for the Convention Venues concerns both vehicle and pedestrian access to areas immediately surrounding those buildings. Areas around the venues will be closed to both vehicles and pedestrians, except for delegates and others who are working or otherwise participating in the event, and who have passed through a magnetometer or similar screening procedure. In order to enter that closed area, which will be delineated by nonopaque security fencing and other barriers, individuals must have event credentials issued by the Secret Service or an event ticket issued by the RNC. This barrier line is typically referred to as the “pedestrian restricted perimeter” or the “secure perimeter.”

17. Entry into the secure perimeter is limited to designated access points where security personnel will be conducting screening, and event credentials or tickets will be checked. These access points are located around the secure perimeter and, in some locations, will facilitate pedestrian access from delegate hotels into the secured area. Access points will also be located at the bus depot to the north of the Fiserv Forum, where delegates arriving on buses will disembark, pass through an access point on Juneau Avenue, and make their way to the Convention Venues.

18. The bus depot is located in the gravel lots to the north of the Fiserv Forum, as that space is of sufficient size to safely and efficiently accommodate the large number of buses that will be used to transport delegates. After completing a series of security assessments, the Secret Service determined that this area would be included within the pedestrian restricted perimeter.

19. The contours of the pedestrian restricted perimeter have been determined by a series of technical security assessments undertaken by the Secret Service as well as evaluations of the unique setting of the buildings that are being secured. The agency is concerned with a myriad of security factors, to include the potential for a person-born explosive, the physical features and elevation of the buildings to be secured, the effective range of weapons, and the potential use of streets and sidewalks for emergency ingress and egress. Establishing the secure perimeter in an urban setting is further complicated by the locations of businesses and homes in the immediate vicinity of the buildings to be secured, and the needs of people not associated with the RNC to safely access areas around the secured buildings.

20. For the RNC, vehicular access to areas around the secure perimeter will require that drivers pass through a vehicle screening point. For purposes of this declaration, I will refer to this area as the “vehicle screening zone.” This zone will surround the pedestrian restricted perimeter and encompass more area than the secure perimeter. Drivers need not have an event credential or ticket to access the zone; the vehicle screening zone is open to all vehicles as long as they are screened. Pedestrians will not be screened, and everyone is free to access the vehicle screening zone.

21. Vehicular screening points will be located around the vehicle screening zone to enable traffic to access areas around the pedestrian restricted perimeter from several directions. I

anticipate that cars will line up to wait to be screened at the vehicular screening points as the process will require vehicles to stop and will take several minutes to complete.

22. The boundaries of the vehicle screening zone were also established after technical security assessments were completed, with a focus on vehicle-born threats.

23. A map reflecting the vehicle screening zone and the pedestrian restricted perimeter will be released to the public on June 21, 2024.

Transportation in and out the Secure Perimeter

24. The Secret Service must ensure that delegates and those working at the RNC are able to safely enter and exit the secure perimeter in both planned and emergency situations, 24-hours a day. For example, buses will be carrying delegates in from the west on Fond du Lac Avenue and from the east on Knapp Street to drop off passengers at the bus depot. Accordingly, the secure perimeter encompasses Fond du Lac, McKinley, and Knapp in that area and ensures that these streets will be available for buses to move safely in and out of the secure perimeter.

25. Similarly, the Secret Service and MPD must ensure that there are a sufficient number of well-placed routes of ingress and egress for emergency responders to access both the area within the secure perimeter as well as areas around it. If there are medical emergencies or a fire, public safety personnel must be able to respond quickly, not only to the Convention Venues but also to the areas and individuals outside the secure perimeter.

26. A key component of security planning for the RNC has focused on ensuring multiple options for emergency vehicles, which requires roadways to be free of pedestrians. In order to preserve safe routes for emergency response to the east of the Convention Venues, State

Street, Kilbourn Avenue, and Wells Street will need to remain free of pedestrian traffic. The high concentration of commercial activity to the east of the Convention Venues, to include restaurants, hotels, and bars that are anticipated to have large crowds of people, may result in a need for emergency services in that area. Accordingly, the Secret Service and MPD have ensured that there are multiple emergency routes to and from the east side of the secure perimeter.

27. Public safety vehicles will be staged to respond to emergencies and will need to cross the Milwaukee River on State Street, Kilbourn Avenue, and Wells Street. Should public safety vehicles require access the east side of the secure perimeter via these roadways, they will need to cross Martin Luther King Jr. Drive.

28. Further, Martin Luther King Jr. Drive, particularly between State Street and Highland Street, is densely populated with bars and restaurants, some of which have narrowed the space available for emergency response as these establishments have expanded their footprint into the street to accommodate patrons outdoors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.

Dated: June 20, 2024


Audrey Gibson-Cicchino